

**Exhibit D**

**ECHN's Response**

Case 25-80002-sji-11 Doc 339-4 Filed 01/31/25 Entered 01/31/25 20:46:51 Desc  
**From:** Smith, Kevin <[ksmith@wigin.com](mailto:ksmith@wigin.com)>  
**Sent:** Monday, January 27, 2025 4:35 PM  
**To:** Mitnick, Jonathan E <[jemitnick@sidley.com](mailto:jemitnick@sidley.com)>  
**Cc:** Califano, Thomas R. <[tom.califano@sidley.com](mailto:tom.califano@sidley.com)>; Ducayet, Jim <[jducayet@sidley.com](mailto:jducayet@sidley.com)>; Saidara, Frank <[Frank.Saidara@pmh.com](mailto:Frank.Saidara@pmh.com)>; 'Rundell, Paul' <[prundell@alvarezandmarsal.com](mailto:prundell@alvarezandmarsal.com)>; Griffin, Scott <[sgriffin@wigin.com](mailto:sgriffin@wigin.com)>  
**Subject:** RE: [EXTERNAL] In re Prospect Medical Holdings, Inc. - Automatic Stay Violation

**EXTERNAL EMAIL - Use caution with links and attachments.**

Mr. Califano:

We are in receipt of your letter, dated Friday, January 24, 2025, alleging violations of section 362 of the Bankruptcy Code by our client Legacy ECHN, Inc. ("Legacy") in connection with the Prospect Medical Holdings, Inc. *et al.* chapter 11 cases. We disagree with the Debtors' position, as discussed during our telephone conference with your colleague, Patrick Venter on January 24th. As you are aware, Legacy has not engaged in post-petition affirmative acts to enforce its judgment against the Debtors or collect on any writs of garnishment relating thereto, and nothing in your letter suggests otherwise. Additionally, we are unaware of any authority in the Fifth Circuit that requires Legacy to obtain a post-petition release of funds garnished or subject to garnishment by creditors, including Anthem Blue Cross and Blue Shield of Connecticut. To the extent that you are aware of such authority, please forward it for our review. As we are continuing to analyze the allegations in your letter and the related case law, we intend to supplement this correspondence with a more fulsome reply by the close of business on January 31st. Accordingly, Legacy reserves all rights.

Please do not hesitate to contact me if you would like to discuss this matter further.

Kevin

**Kevin M. Smith**

Partner  
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